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*Attorneys for the Olaplex Defendants
(listed on signature page)*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LESLIE LILIEN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

OLAPLEX HOLDINGS, INC., ET AL.,

Defendants.

Case No. 2:22-CV-08395-SVW-SK

**JOINT STIPULATION REGARDING
SETTLEMENT**

Honorable Stephen V. Wilson

1 This stipulation is entered between Lead Plaintiff Arkansas Teacher Retirement
2 System (“ATRS” or “Lead Plaintiff”), on behalf of itself and all members of the
3 putative class in this action, and Defendants Olaplex Holdings, Inc. (“Olaplex”), JuE
4 Wong, Eric Tiziani, Tiffany Walden, Christine Dagousset, Tricia Glynn, Deirdre
5 Findlay, Janet Gurwitch, Martha Morfitt, David Mussafer, Emily White, Michael
6 White, and Paula Zusi (the “Individual Defendants,” together with Olaplex, the
7 “Defendants” and, collectively with Lead Plaintiff, the “Parties”).

8 WHEREAS, the Parties have reached a settlement in principle to resolve all
9 claims in this litigation on a class-wide basis;

10 WHEREAS, this case is currently set for trial to begin on October 14, 2025 (ECF
11 No. 181) (“Trial Date”);

12 WHEREAS, this Court has set certain pretrial deadlines and hearings, including
13 a hearing for Lead Plaintiff’s motion for class certification that is currently scheduled
14 for July 21, 2025 (ECF No. 181), and the Local Civil Rules for the Central District of
15 California likewise provide for certain pretrial deadlines;

16 WHEREAS, the Parties request that the Court vacate all deadlines, hearings, and
17 the Trial Date to allow the Parties to finalize documentation of the settlement and Lead
18 Plaintiff to submit a motion for preliminary approval of the proposed class action
19 settlement.

20 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by
21 and between the Parties, subject to the Court’s approval, that:

- 22 1. All deadlines, hearings, and the Trial Date, are vacated.
- 23 2. Lead Plaintiff shall file a motion for preliminary approval of the proposed
24 class action settlement on or before August 13, 2025.

1 **IT IS SO STIPULATED.**

2
3 DATED: July 2, 2025

4 /s/ Lauren A. Ormsbee

5 Lauren A. Ormsbee (*pro hac vice*)
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7 Charles J. Stiene (*pro hac vice*)
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18 *Teacher Retirement System*

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and Paula Zusi

1 IT IS SO ORDERED.

2 Date: _____

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Honorable Stephen V. Wilson
5 United States District Judge

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ATTESTATION OF FILING

Pursuant to Local Rule 5-4.3.4 regarding signatures, I, Lauren A. Ormsbee, hereby attest that the other signatories listed above, on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 2, 2025

By: /s/ Lauren A. Ormsbee
Lauren A. Ormsbee